

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

JASMINE BURGESS, on behalf of all other  
similarly situated,  
Plaintiff,

v.

MAJOR MODEL MANAGEMENT, INC. and  
GUIDO DOLCI

Defendants.

**CIVIL ACTION NO.:**  
1:20-CV-02816-GHW

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE**, that upon the annexed Memorandum of Law dated February 25, 2021, Declaration of Scott Green, Esq. dated February 25, 2021, and the exhibits attached thereto, together with all prior proceedings had herein, defendants Major Model Management, Inc. and Guido Dolci will move this Court before the Honorable District Judge Gregory H. Woods at the Daniel Patrick Moynihan United States Courthouse located at 500 Pearl Street, New York, NY 10007, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice the first, second, third, fourth, fifth, sixth, and seventh causes of action in the Amended Class and Collective Action Complaint filed in this action by plaintiff Jasmine Burgess, individually and on behalf of all others similarly situated, and granting such further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Rule 6 of the Federal Rules of Civil Procedure and Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, opposition papers, if any, must be served within fourteen days of the filing of this motion; reply papers if any, must be served within seven days of service of opposition papers.

Dated: Garden City, New York  
February 25, 2022

GOLDBERG SEGALLA LLP

By: \s\ Scott R. Green

Scott R. Green  
200 Garden City Plaza, Suite 520  
Garden City, New York 11530  
Phone: (516) 281-9859  
Fax: (516) 281-9801  
*Attorneys for Defendants*  
*Major Model Management, Inc. and*  
*Guido Dolci*

To: All Counsel (via ECF)